

September 24, 2001

Mr. Dan Stockton
Herff Jones, Inc.
4719 West 62nd St.
Indianapolis, Indiana 46268

RE: Minor Source Operating Permit
MSOP 097-12651-00395

Dear Mr. Stockton:

Enclosed is a Minor Source Operating Permit issued in approval of the installation of the following equipment or operations:

- (a) One (1) decorative chromium electroplating operation consisting of: Two (2) decorative chromium tanks, identified as Tank #1 and Tank #2, using a hexavalent chromium bath, equipped with a wetting agent as a control, exhausting to stack C-16.

Please note that this approval has been issued with certain conditions, which are on the permit under "Construction Conditions" and "Operation Conditions". If the conditions are not acceptable, contact the Office of Environmental Services (OES) by letter or telephone within fifteen (15) days from the date of this letter. The Division will arrange a meeting to discuss the conditions in questions. If no agreement is reached, the Indianapolis Air Pollution Control Board may be petitioned within fifteen (15) days of the date of the meeting. The Board, after public notice and hearing, may sustain, modify, or rescind the conditions. Note that additional conditions may be included in the Operating Permit issued for the above equipment.

Please keep this Permit (or a copy) on file at the facility available for inspection by OES personnel. If any of the conditions are not acceptable please follow the procedures listed above.

If you have any questions, please contact Mr. Scott Dombrowski at (317) 327-2234. Thank you for your time and cooperation in this matter.

Sincerely,

Vaneeta M. Kumar
Administrator
Office of Environmental Services

cc: source file
compliance - Matt Mosier
IDEM/OAQ- Mindy Hahn

**MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY
AND
INDIANAPOLIS ENVIRONMENTAL RESOURCES
MANAGEMENT DIVISION**

**Herff Jones, Inc.
4719 West 62nd St.
Indianapolis, Indiana 46268**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-12651-00395	
Issued by: Vaneeta Kumar, Administrator, Office of Environmental Services	Issuance Date: Expiration Date:

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This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary decorative chromium plating operation.

Authorized Individual: Dan Stockton
Source Address: 4719 West 62nd St., Indianapolis, Indiana, 46268
Mailing Address: 4719 West 62nd St., Indianapolis, Indiana, 46268
Phone Number: (317) 329-3332
SIC Code: 3911
County Location: Marion
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) decorative chromium electroplating operation consisting of: Two (2) decorative chromium tanks, identified as Tank #1 and Tank #2, using a hexavalent chromium bath, equipped with a wetting agent as a control, exhausting to stack C-16.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Minor Source Operating Permit Renewal [326 IAC 2-6.1-7]

Pursuant to 326 IAC 2-6.1-7, an operating permit shall be valid for a period of time not to exceed five (5) years. However, permits may be valid for any lesser period if determined necessary for administrative reasons by IDEM, OAQ, or OES. At least ninety (90) calendar days prior to the expiration date of an operating permit, the applicant shall apply for a new operating permit from IDEM, OAQ, or OES. If a timely and sufficient application for renewal has been made, the existing permit does not expire until a final decision on the application for renewal has been made by the department. The application for the operating permit renewal shall include the following information:

- (a) Certification that the source has not changed from the initial permit issuance or that all modifications to the source have been reviewed and approved in accordance with this rule.
- (b) Identification of any changes to the source that are subject to this article that have not received approval prior to construction or operation.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of any regulated pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ and OES prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, and OES upon request and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OES and OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES Air Quality, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity) monitor in a six (6) hour period.

Testing Requirements

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ and OES.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

at least sixty (60) days before the intended test date for all chromium electroplating facilities and no later than thirty-five (35) days prior to the intended test date for all other facilities. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two (2) weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ and OES within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES if the source submits to IDEM, OAQ and OES, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C.8 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ and OES shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ and OES within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ and OES reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ and OES may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), Office of Environmental Services (OES) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ and OES, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C.8 -

Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and OES may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and OES representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a

violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) A malfunction as described in 326 IAC 1-6-2; or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a

compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality and OES stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and
Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Chromium Electroplating Operation

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) Decorative Chromium Electroplating Operation consisting of:

- (a) Two (2) decorative chromium electroplating tanks, identified as Tank #1 and Tank #2, using a hexavalent chromium bath, equipped with a wetting agent as a control, and exhausting to one (1) stack, identified as C-16.

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to both tanks #1 and #2.

D.1.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)] [326 IAC 20-8-1]

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tanks #1 and #2 by:
 - (1) Not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb./ft)] at any time during operation of tanks #1 and #2 when a chemical fume suppressant containing a wetting agent is used.

D.1.4 Work Practice Standards [40 CFR 63.342(f)] [326 IAC 20-8-1]

The following work practice standards apply to tanks #1 and #2:

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks #1 and #2, wetting agent fume suppressant, and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.6.
- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.6.
- (c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.
- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, and OES which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.
- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ and OES may require that the Permittee make changes to the OMP required by

Condition D.1.6. Revisions may be required if IDEM, OAQ and OES finds that the plan:

- (1) Does not address a malfunction or period of excess emissions that has occurred;
- (2) Fails to provide for the operation of tanks #1 and #2, wetting fume suppressant, and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
- (3) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control equipment (wetting agent fume suppressant), or monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP), in accordance with Section C.2-Preventive Maintenance Plan, of this permit, is required for tanks #1 and #2.

D.1.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)] [326 IAC 20-8-1]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks #1 and #2. The OMP shall specify the operation and maintenance criteria for tanks #1 and #2, wetting agent fume suppressant, and monitoring equipment and shall include the following elements:
 - (1) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension;
 - (2) A standardized checklist to document the operation and maintenance criteria for tanks #1 and #2, the wetting agent fume suppressant, and the monitoring equipment.
 - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.
 - (4) A systematic procedure for identifying malfunctions and periods of excess emissions of tanks #1 and #2, wetting agent fume suppressant and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.5, the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).
- (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks #1 and #2, the wetting agent fume suppressant, and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
- (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2)

working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ, and OES.

- (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ, and OES for the life of tanks #1 and #2 or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ, and OES for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 2-1.1-11] [326 IAC 20-8-1]

- (a) The Permittee is not required to further test tanks #1 and #2 by this permit. However, the IDEM and OES may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM and OES, compliance with the limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C.8 - Performance Testing.
- (b) Any change, modification, or reconstruction of tanks #1 and #2, the wetting agent fume suppressant, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C.8- Performance Testing.

D.1.8 Establishing Site-Specific Operating Parameter Values [40 CFR 63.343(c)] [40 CFR 63.344(d)] [326 IAC 20-8-1]

In lieu of establishing the maximum surface tension during a performance test, the Permittee shall accept 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. The Permittee is exempt from conducting a performance test only if the criteria of 40 CFR 63.343(b)(2) are met.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.9 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)] [326 IAC 20-8-1]

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the electroplating bath to comply with the limit specified in Condition D.1.3, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tanks #1 and #2 at a surface tension greater than 45 dynes per centimeter shall constitute noncompliance with the standards.
 - (1) The Permittee shall monitor the surface tension of the electroplating bath during tank operation according to the following schedule:
 - (A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part.
 - (B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is

once every 40 hours of tank operation. Pursuant to the letter dated December 2, 1996, attached as Appendix A, the permittee shall measure the surface tension once every five days of operation provided there are no more than 40 hours of operation between each measurement.

- (C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (B) above. For example, if a Permittee had been monitoring a tank once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
- (2) Once a bath solution is drained from tanks #1 or #2 and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures in paragraphs (B) and (C) above.
- (b) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts may be considered operating time.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.10 Record Keeping Requirements [40 CFR 63.346] [326 IAC 20-8-1]

The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C.14 - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the wetting agent fume suppressant, and monitoring equipment to document that the inspection and maintenance required by Conditions D.1.7 and D.1.9 have taken place. The record can take the form of a checklist and should identify the following:
 - (1) The device inspected;
 - (2) The date of inspection;
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks #1 and #2 and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks #1 and #2 and monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks #1 and #2 and monitoring equipment as indicated by monitoring data

collected in accordance with this condition.

- (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
- (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (g) Test reports documenting results of all performance tests.
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (j) The total process operating time, as defined in Condition D.1.9(b), of each tank, during the reporting period.
- (k) Records of the date and time that fume suppressants were added to the electroplating bath, and the amount and type of fume suppressants added.
- (l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.11.

D.1.11 Reporting Requirements [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345, 63.347] [326 IAC 20-8-1]

The notifications and reports required in this section shall be submitted to IDEM, OAQ, and OES using the address specified in Section C.15 - General Reporting Requirements.

(a) Notifications:

- (1) Initial Notifications
The Permittee shall notify IDEM, OAQ and OES in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).
- (2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.
 - (A) The NCS shall be submitted to IDEM, OAQ, and OES and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).
 - (B) The NCS for tanks #1 and #2 shall be submitted to IDEM, OAQ, and OES immediately.
- (3) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ, and OES. In addition, the Permittee may not change, modify, or reconstruct tanks #1 and #2 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ, and OES.
 - (A) The NCR shall contain the information identified in 40 CFR 63.345(b) (2) and (3).

- (B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.
- (C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks #1 and #2 serves as this notification.
- (D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ, and OES before construction, modification, or reconstruction may commence.

(b) Performance Test Results

The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).

The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, described in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.

(c) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of tanks #1 and #2 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks #1 and #2 are located at a site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ and OES upon request.

- (1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (c)(2).

- (A) The first report shall cover the period from the issuance date of this permit to December 31 of the year in which the permit is issued.
- (B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.

- (2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAQ and OES:

- (A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.9(b) for the reporting period; or
- (B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.9(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (3) IDEM, OAQ and OES may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
Office of Environmental Services
AIR QUALITY SECTION**

**MINOR SOURCE OPERATING PERMIT
CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT**

Source Name: Herff Jones, Inc.
Source Address: 4719 West 62nd St., Indianapolis, Indiana 46268
Mailing Address: 4719 West 62nd St., Indianapolis, Indiana 46268
Part 70 Permit No.: 097-12651-00395

Tank ID #: Tank #1
Type of process: Decorative
Monitoring Parameter: Surface tension of the electroplating bath
Parameter Value: 45 dynes per centimeter
Limits: Total chromium concentration may not exceed 0.01 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
The frequency for completing this report may be altered by IDEM, OAQ, Compliance Branch.

Companies classified as an area source: **Complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.**

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:

TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

MAJOR AND AREA SOURCES: CHECK ONE

- 9** NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
- 9** THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:

IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:
LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

- | | |
|---|--|
| 9 | I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE. |
| 9 | THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED. |

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
Office of Environmental Services
AIR QUALITY SECTION**

**MINOR SOURCE OPERATING PERMIT
CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT**

Source Name: Herff Jones, Inc.
Source Address: 4719 West 62nd St., Indianapolis, Indiana 46268
Mailing Address: 4719 West 62nd St., Indianapolis, Indiana 46268
Part 70 Permit No.: 097-12651-00395

Tank ID #: Tank #2
Type of process: Decorative
Monitoring Parameter: Surface tension of the electroplating bath
Parameter Value: 45 dynes per centimeter
Limits: Total chromium concentration may not exceed 0.01 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
The frequency for completing this report may be altered by IDEM, OAQ, Compliance Branch.

Companies classified as an area source: Complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:

TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

MAJOR AND AREA SOURCES: CHECK ONE

9 NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.

9 THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:

IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:
LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

- | | |
|---|--|
| 9 | I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE. |
| 9 | THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED. |

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
Office of Environmental Services
AIR QUALITY SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under
326 IAC 2-6.1-5(a)(5).

Company Name:	Herff Jones, Inc.
Address:	4719 West 62nd St.
City:	Indianapolis, Indiana 46268
Phone #:	(317) 329-3332
MSOP #:	097-12651-00395

I hereby certify that Herff Jones, Inc. is **9** still in operation.
9 no longer in operation.

I hereby certify that Herff Jones, Inc. is **9** in compliance with the requirements of MSOP 097-12651-00395.

9 not in compliance with the requirements of MSOP 097-12651-00395.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967
and
Office of Environmental Services
AIR QUALITY SECTION**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____ / ____ / 20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____ / ____ / 20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
Office of Environmental Services
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**MINOR SOURCE OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Herff Jones, Inc.
Source Address: 4719 West 62nd St., Indianapolis, Indiana 46268
Mailing Address: 4719 West 62nd St., Indianapolis, Indiana 46268
MSOP No.: 097-12651-00395

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Appendix A

06/13/2001 07:54 FAX 3172326749

IDEM OAG PERMIT BRANCH



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor

Michael O'Connor
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA CERTIFIED MAIL #P 451 340 887
61-50

December 2, 1996

Mr. Vincent P. Meyers
Herff Jones, Inc.
4719 West 62nd Street
Box 68956
Indianapolis, Indiana 46268-0956

RE: Alternate Monitoring Frequency
Request

Dear Mr. Meyers:

This will acknowledge receipt of your letter dated October 31, 1996. You are requesting approval to measure the surface tension of each of the two decorative chrome electroplating tanks every fifth day of operation. Please be advised that this is acceptable. You are approved to measure the surface tension of each of the two decorative chrome electroplating tanks once each fifth day of operation on an ongoing basis provided there are no more than forty hours of operation between measurements for each tank.

Should the surface tension of a tank ever exceed the 45 dynes/cm limit, you must add wetting agent and measure the surface tension of that tank once every four hours of operation for a total of forty hours of operation. If all of those measurements are less than the 45 dynes/cm limit, you must then measure the surface tension of that tank once every eight hours of operation for a total of forty hours of operation. Again, if all measurements are less than the 45 dynes/cm limit, you must measure the surface tension of that tank once every fifth day of operation provided there are no more than forty hours of operation between each measurement. All measurements must be made at the end of the reporting period (i.e., at the end of the four hour operation period or eight hour operation period, plus or minus fifteen minutes). When measuring the surface tension of each tank on the fifth day of operation of that tank, you may measure anytime during the fifth day during operation provided there are no more than forty hours of operation between measurements.

Since your decorative chrome electroplating operations did not have to be in compliance until January 25, 1996, and you had until July 25, 1996 to demonstrate compliance, any inspection conducted prior to July 25, 1996 would not have identified violations of a law not yet in effect. Rather, it was our intent to educate and work with sources to ensure compliance by the appropriate date. It has been necessary to clarify and define some

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portions of Rule 326 IAC 20-8 that are unclear. Monitoring frequency for surface tension was an area requiring clarification. In any event, it is not reasonable to interpret the monitoring frequency as being anytime during the reporting period (i.e., anytime during the four hour period of operation, eight hour period of operation or forty hour period of operation). Consequently, we have interpreted the frequency to mean the measurement must be taken at the end of the particular reporting period.

We appreciate your past cooperation and look forward to working with you in the future. Should you have any questions or comments, please contact David Rice by mail at the above address or contact him via telephone at (317) 232-8220.

Sincerely,


Herman D. Carney, Chief
Air Compliance Section I
Office of Air Management

cc: Mike Brooks, Office of Air Management
Richard Sekula, Office of Air Management
Robert Holm, City of Indianapolis Environmental Management Resources Office

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Indianapolis Office of Environmental Services**

Addendum to the
Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Herff Jones, Inc.
Source Location: 4719 West 62nd St., Indianapolis, Indiana 46268
County: Marion
SIC Code: 3911
Operation Permit No.: 097-12651-00395
Permit Reviewer: Scott L. Dombrowski

On July 13, 2001, the Office of Air Quality (OAQ) and Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star and News, Indianapolis, Indiana, stating that Herff Jones, Inc. had applied for a Minor Source Operating Permit (MSOP) for a decorative chromium electroplating operation. The notice also stated that OAQ and ERMD proposed to issue a permit for this operation and provided information on how the public should review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following change to the draft MSOP will be made. The TSD will remain as it originally appeared when published. OAQ and ERMD prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 1:

After further review, it has been established that an enforcement action was taken against Herff Jones. Since applicants may not apply any later than December 25, 1999, a warning letter was issued to Herff Jones, in accordance with 326 IAC 2-6.1-3, for applying on August 22, 2000. Although this error should be noted, no change to the original TSD will occur.

Change 1:

During the course of the public notice period, the Environmental Resources Management Division changed its name to the Office of Environmental Services (OES). All references to Environmental Resources Management and ERMD have been removed and replaced with the Office of Environmental Services and (OES). This change is now effective throughout the permit.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Indianapolis Environmental Resources Management Division**

Technical Support Document (TSD) for a Minor Source Operating Permit

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Operation Permit No.: 097-12651-00395
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The City of Indianapolis (ERMD) and the Office of Air Quality (OAQ) have reviewed an application from Herff Jones, Inc. relating to the operation of a decorative chromium electroplating process.

Emission Units and Pollution Control Equipment

The source consists of the following emission units and pollution control devices:

- (a) One (1) decorative chromium electroplating operation consisting of: Two (2) decorative chromium tanks, identified as Tank #1 and Tank #2, using a hexavalent chromium bath, equipped with a wetting agent as a control, exhausting to stack C-16.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
C-16	Chromic Acid Bath Hood	17	0.5	920	70

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on August 22, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	0.0
CO	0.0
NO _x	0.0

HAP's	Potential To Emit (tons/year)
Chromium	N/A

- (a) This source is a decorative chromium electroplating operation that uses a hexavalent chromium bath; therefore, pursuant to 326 IAC 2-5.1-3, a minor source operating permit will be issued.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM₁₀, SO₂, No_x, and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.0
PM ₁₀	0.0
SO ₂	0.0
VOC	0.0
CO	0.0
NO _x	0.0
Single HAP	N/A
Combination HAPs	N/A

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) Tanks #1 and #2 are subject to the National Emission Standards for Hazardous Air Pollutants, (40 CFR 60, Subpart N, and 326 IAC 20). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:

(1) Emissions Limitation:

- (A) The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.
- (B) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs. Pursuant to 40 CFR 63.8, the surface tension measurement frequency may be adjusted to the frequency schedule as stipulated in the attached Alternative Monitoring Frequency Request. (See Appendix A)
- (C) An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.

(2) Monitoring Requirements:

- (A) The Permittee shall monitor the surface tension of the electroplating baths in both tanks #1 and #2. Operation of either tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. The surface tension of each tank in operation shall be monitored according to the following schedule:
- (i) The surface tension shall be measured once every four (4) hours for the first forty (40) hours of operating time with a stalagmometer or a tensiometer as specified in 40 CFR 63, Appendix A, Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities). If a tensiometer is used to measure surface tension, the instructions given in ASTM Method D 1331-89, "Standard Test Methods for Surface and Interfacial Tension of Solutions of Surface Active Agents," must be followed.
- (ii) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of operating time, the surface tension measurement may be conducted once every eight (8) hours of operating time. Once there are no exceedances during forty (40) hours of operating time, surface tension measurement may be conducted once every forty (40) hours of operating time on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAM and

ERMD until an exceedance occurs.

The source agrees to conduct surface tension measurements, at a minimum, once each day of operation provided there are no more than forty (40) hours of operating time between successive surface tension measurements.

- (B) Once an exceedance occurs through tank surface tension measurement, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of monitoring surface tension is allowed as stated in Condition D.1.6(b) above.
 - (C) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency.
 - (D) Operating time for chromium electroplating is that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.
- (3) Reporting Requirements:

- (A) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Quality
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (B) The chromium electroplating operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.
- (C) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart N.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Marion County and the potential to emit VOC and NO_x is less than ten (10)

tons per year. Potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 1-6-3 (Preventive Maintenance Plan)

A Preventive Maintenance Plan is required for both tanks #1 and #2.

326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants)

The potential to emit a single Hazardous Air Pollutant (HAP) will be less than 10 tons per year. The potential to emit a combination of HAPs will be less than 25 tons per year. Therefore, rule 2-4.1 does not apply.

326 IAC 20 (HAPs: Incorporation of Federal Regulations)

Pursuant to 326 IAC 20, the Federal regulations for Hazardous Air Pollutants, 40 CFR 63, Subpart A, are incorporated by reference.

Conclusion

The operation of this decorative chrome plating process shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-12651-00395.